

Exhibit 85

I, Kanon Spackman, hereby declare and state as follows:

1. I am over the age of 18, and a Plaintiff in this action. The facts contained in this declaration are based on my personal knowledge, and if called upon to do so, I could and would testify competently hereto.

2. I submit this declaration in support of the Second Amended Class Action Complaint filed concurrently herewith, pursuant to California Civil Code § 1780(d).

3. This complaint is being filed in the United States District Court for the Eastern District of Michigan. Defendant FCA US, LLC's principal place of business and headquarters is in Oakland County, Michigan, which is in that district.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on 11/21/24 | 9:32 AM PST, in Los Angeles, California

DocuSigned by:


Kanon Spackman

1736D7C1700C439...

Kanon Spackman